



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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October 3, 2016

Ref: 8EPR-N

Jimmy Tyree, Field Office Manager
St. George Field Office
345 E. Riverside Drive
St. George, UT 84790

Re: Proposed Resource Management Plans/Proposed Saint George, Utah, Field Office Resource Management Plan Amendment and Final Environmental Impact Statement for the Beaver Dam Wash and the Red Cliffs National Conservation Areas **CEQ Control #20160191**

Dear Field Manager Tyree:

The U.S. Environmental Protection Agency Region 8 appreciates the opportunity to review the Bureau of Land Management's (BLM's) St. George Field Office documents related to the Beaver Dam Wash and the Red Cliffs National Conservation Areas (NCAs), including the Proposed Resource Management Plans, Proposed Saint George, Utah, Field Office Resource Management Plan Amendment (the RMPs) and the Final Environmental Impact Statement (Final EIS) for the NCAs.

In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Final EIS and proposed RMPs. This letter includes remaining comments for consideration as BLM develops the decision and subsequent implementation plan.

Specific Remaining Comments

Transportation and Utility Corridor in Red Cliffs NCA

The Final EIS includes responses to the EPA's comments pointing out available use alternatives for lands and realty and the related analysis found in Chapter 4 of the Final EIS in the Red Cliffs NCA. The preferred alternative in the Final EIS (Alternative B – Map 2-44 and descriptive text) does not designate a Northern Transportation Route right of way (ROW). The Final EIS specifies that any future ROW developments will conform to the land use plan and will be subject to a site specific NEPA analysis. The Frequently Asked Questions document states, "While the Proposed RMP for Red Cliffs NCA does not designate a utility corridor, it would designate an avoidance area wide enough to accommodate a northern route and utility corridor. An avoidance area is where new rights-of-way are not encouraged, but could possibly be granted if certain conditions are met. In this case, any route must meet criteria specified in the Proposed RMP and be consistent with the Omnibus Public Land Management Act of 2009's (OPLMA's) conservation purpose for the NCA." The BLM further clarifies that designation of a corridor in the RMP would have been inconsistent with the Washington County Habitat Conservation

Plan and OPLMA's direction to only allow uses that further the purposes Congress established for the area, including protecting threatened or endangered species located in the NCA. We appreciate the BLM's clarifications, emphasis and how the Final EIS Preferred Alternative addresses this ROW proposal because of the additional clarity and advanced notice given to the public regarding a major development (which remains subject to requirements, but not currently prohibited). This Northern Transportation Route ROW would likely have significant cultural, biological and growth-based resource impacts and could make several of the Congressional mandates and objectives of establishing the NCA under OPLMA difficult to achieve. It is therefore recommended that if this Northern ROW is reevaluated in the future, that evaluation should be done under a full EIS review. Please see the EPA's November 2016 letter for a more detailed justification for a full EIS-level analysis. The EPA requests notification if BLM anticipates scoping for a Northern Transportation Route ROW NEPA analysis.

Climate Change and Green House Gas Emissions

After the EPA's November 2015 comments on the Draft EIS and RMPs, the Council on Environmental Quality (CEQ) released its Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas (GHG) Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews.¹ The EPA and other federal land management agencies have gained more familiarity with tools that may be used to complete analyses of GHG emissions and climate change impacts. Tools for analyzing or predicting how global or regional climate systems may be affected by a particular activity or activities within the Saint George planning area exist, and may be found on CEQ's NEPA.gov website.² There are some tools that may be of use for project level applications that also fit the NCA area ecosystem and land use scenarios (e.g., COMET-FARM and/or NONROAD). If the BLM Utah State Office, or the Saint George Field Office finds these or other tools useful, the EPA will work with BLM to identify specific case studies that have used them and whether they would reasonably be adoptable to fit these NCA resource protection implementation plans.

Surface Water and Aquatic Resources

The BLM's response to the EPA's comments specify water quality monitoring plans and a commitment to develop aquatic resource (e.g., water bodies, riparian areas, seeps and wetlands) inventories, maps, and functional assessment reports as resources are made available under the RMP implementation strategies. The EPA recommends that the RODs and implementation plans identify best and worst case funding scenarios and associated timeframes for when this effort could be completed.

Ground Water Resources

The EPA recognizes the Final EIS statement that no laws exist requiring establishment of groundwater monitoring or protection programs for National Conservation Lands under BLM's purview. We nonetheless point out that it may be in BLM's interest to assess groundwater resources in these NCAs. BLM's NCAs feature exceptional scientific, cultural, ecological, historical, and recreational values. The NCAs were designated by Congress to conserve, protect, enhance, and manage public lands for the benefit and enjoyment of present and future generations. Groundwater is an important ecological resource, and particularly in arid areas, it can influence vegetation patterns and wildlife habitat capacity.

¹ https://www.whitehouse.gov/sites/whitehouse.gov/files/documents/nepa_final_ghg_guidance.pdf

² https://ceq.doe.gov/current_developments/GHG-accounting-tools.html

Groundwater also supports the growing human population in this project area and it provides for agricultural, industrial and drinking water uses. Additionally, climate change (*e.g.*, hotter conditions, higher evaporation rates, and more intense drought periods³ and health impacts due to droughts⁴) may result in increased demands on existing groundwater sources and development of aquifers not historically used. Given these stressors, it seems important to understand the baseline conditions of the NCA's groundwater resources, and to monitor groundwater levels and quality changes over time to ensure the OPLMA goals can be sustainably met. A groundwater assessment program could gather the data necessary to quantify climate change impacts to the NCAs' groundwater dependent resources over time in accordance with the goals of the CEQ's final greenhouse climate change guidance. The EPA continues to recommend that BLM commit to developing a ground water resource vulnerability analysis, and a groundwater assessment system. This resulting information would enable BLM to assure its future decisions do not adversely affect groundwater and the vegetation and wildlife resources that depend on that water within the NCAs.

Please feel free to contact me at (303) 312-6704, or Nat Miullo, lead NEPA reviewer, at 303-312-6233, if you have any questions or would like to discuss the effort further.

Sincerely,



Phillip S. Strobel
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

Email: Keith Rigtrup, BLM, RMP Planner

³ http://drought.unl.edu/Portals/0/user_image/news/2016%20news/Jan16summ/20160126_usdm.png

⁴ <http://health.utah.gov/enviroepi/publications/Climate%20Change%20Booklet%20WEB%20compressed.pdf>

